

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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THE UNITED STATES OF AMERICA

vs.

PATRICK McGOVERN-ALLEN

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SUPERSEDING INDICTMENT

Counts

**18 U.S.C. § 2261A(1) (stalking - 2 counts)**

**18 U.S.C. § 844(h) (use of fire in commission of a federal felony - 1 count)**

**18 U.S.C. § 2 (aiding and abetting)**

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[REDACTED]  
\_\_\_\_\_  
Foreman

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Filed in open court this 27<sup>th</sup> day,  
Of October A.D. 2022

Clerk

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Bail, \$ \_\_\_\_\_

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA : CRIMINAL NO. 22-cr-288**

**v. : DATE FILED: \_\_\_\_\_**

**PATRICK McGOVERN-ALLEN : VIOLATION:**  
**: 18 U.S.C. § 2261A(1) (stalking - 2 counts)**  
**: 18 U.S.C. § 844(h) (use of fire in**  
**commission of a federal felony - 1**  
**: count)**  
**18 U.S.C. § 2 (aiding and abetting)**

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about December 18, 2021, in the Eastern District of Pennsylvania and elsewhere, defendant

**PATRICK McGOVERN-ALLEN**

traveled in interstate commerce from the State of New Jersey to Abington Township in the Commonwealth of Pennsylvania, with the intent to harass and intimidate another person, A.R., a juvenile, a person known to the grand jury, and in the course of and as a result of such travel caused substantial emotional distress to A.R. and placed a member of A.R.'s immediate family in reasonable fear of death or serious bodily injury, and the defendant used a dangerous weapon during the offense.

In violation of Title 18, United States Code, Sections 2261A(1), 2261(b), and 2261B.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 18, 2021, in the Eastern District of Pennsylvania and elsewhere, defendant

**PATRICK McGOVERN-ALLEN**

knowingly used fire, and aided and abetted the use of fire, to commit stalking, in violation of Title 18, United States Code, Sections 2261A(1), 2261(b) and 2261B, a felony prosecutable in a court of the United States.

In violation of Title 18, United States Code, Sections 844(h)(1) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 2, 2022, in the Eastern District of Pennsylvania and elsewhere, defendant

**PATRICK McGOVERN-ALLEN**

traveled in interstate commerce from the State of New Jersey to Westtown East Goshen Township in the Commonwealth of Pennsylvania, with the intent to harass and intimidate another person, K.M., a person known to the grand jury, and in the course of and as a result of such travel placed K.M. in reasonable fear of death or serious bodily injury, and the defendant used a dangerous weapon during the offense.

In violation of Title 18, United States Code, Sections 2261A(1), and 2261(b).

**A TRUE BILL:**

A redacted signature, appearing as a black rectangular block with a stylized, illegible shape inside.

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JACQUELINE C. ROMERO  
United States Attorney